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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Part 90 of the)	PR Docket No. 93-144
Commission's Rules to Facilitate Future)	RM-8117, RM-8030
Development of SMR Systems in the)	RM-8029
800 MHz Frequency Band)	
)	
and)	
)	
Implementation of Section 309(j) of the)	PP Docket No. 93-253 ✓
Communications Act - Competitive)	
Bidding)	
800 MHz SMR)	

MAR 25 1993

To: The Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

COMMENTS

Larry W. Craig d/b/a Craig Antenna Service, Trad, Inc., and Bill's Radio (the Parties) hereby submit comments in regard to the above-captioned matter. In support of their position, the Parties state the following:

The Parties have considered the various proposals contained within the Further Notice of Proposed Rule Making and respectfully request the Commission to reject them in their entirety. The proposals, individually and collectively, seemed designed to benefit a few large operators at the expense of the many small operators.

The Parties, each a small operator, are grateful for this opportunity to inform the Commission that the proposals, as written, would adversely affect each of their

businesses. None of them would be in a position to bid on an MTA or a BTA. Implementation of the proposed auction would put each of the Parties at the mercy of the large operator with no concomitant benefit to them. They, and their customers would be shuffled around the 800 MHz band, forced to explain to each of their customers why the retooling of their equipment is necessary. Undoubtedly, each would bear the ultimate cost of such a plan.

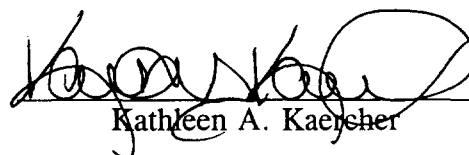
In addition, the Parties are at a loss to understand how ESMR eclipsed SMR in importance in the Commission's eyes. SMR provides a valuable service to small businesses throughout the country. ESMR promised the Commission in 1991, when the first waiver was requested, that it could work with the present system of regulation in building its experimental service. Now, like kudzu, ESMR threatens to choke the host industry which it should thank for its start. Yet ESMR does not have nearly the universal acceptance and usage of SMR. The Parties fervently believe that, at the very least, before the Commission proceeds with the proposals outlined in the FNPRM, ESMR should be made to prove itself worthy of such largesse by having already attracted sufficient numbers of customers. Indeed, since it would appear that the implementation of the Commission's plans will, necessarily result in a blow, perhaps fatal, to the SMR industry, the Commission should postpone any action until ESMR appears more beneficial on balance than SMR.

Conclusion

For all the foregoing reasons, the Parties respectfully request that the Commission reject the proposals contained in the above-captioned FNPRM.

Respectfully submitted,
LARRY W. CRAIG
D/B/A CRAIG ANTENNA SERVICE
TRAD, INC.
BILL'S RADIO

By


Kathleen A. Kaercher

Brown and Schwaninger
Suite 650
1835 K Street, N.W.
Washington, D.C. 20006
202/223-8837

Dated: 3/23/95

CERTIFICATE OF SERVICE

I hereby certify that on this twenty-third day of March, 1995, I served a copy of the foregoing Comments on the following by placing a copy in the United States Mail, first class postage prepaid:

Gardner, Carton & Douglas
1301 K Street, N.W.
Suite 900, East Tower
Washington, D.C. 20005

Young & Jallow
2300 N Street, N.W.
Suite 600
Washington, D.C. 20037

Kelly & Povich, P.C.
1101 30th St., N.W.
Suite 300
Washington, D.C. 20007

Counsel for:
Pittencrief Communications, Inc.
E.F. Johnson Company
Gulf Coast Radio Fone
Deck Communications, Inc.
Nodak Communications
Wiztronics, Inc.
Raserco, Inc.
Vantek Communication, Inc.
Southern Minnesota Communications
Brandon Communications, Inc.
Dakota Electronics
Bis-Man Mobile Phone, Inc.
Rayfield Communications
B & C Communications
Radio Communications Center
Keller Communication, Inc.
Don Clark Radio Communications
Pro-Tec Mobile Communications
Automated Business Communication
Morris Communications
Nielson Communications
E.T. Communications Company
Bolin Communications System
Diamond "L" Industries, Inc.

Counsel for:
Ericsson Corporation

Lukas, McGowan, Nace & Gutierrez
1111 19th Street, N.W.
Washington, D.C. 20036

Counsel for:
Fisher Communications, Inc.
American Mobile Telecommunications Assoc.

Motorola, Inc.
1350 Eye Street, N.W.
Suite 400
Washington, D.C. 20005

Counsel for:
Advanced Mobilecomm, Inc.

Mintz, Levin, Cohn, Ferris, Glovsky, &
Popeo, P.C.
701 Pennsylvania Ave., N.W.
Washington, D.C. 20004

Counsel for:
McCaw Cellular Communications, Inc.

Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, NW
Suite 300
Washington, DC 20554

Counsel for:
The SMR Small Business Coalition

Mark J. Golden
Meyer, Faller, Weisman & Rosenberg, P.C.
4400 Jennifer Street, NW
Suite 300
Washington, DC 20015

Wiley Rein & Fielding
1776 K Street, NW
Washington, DC 20006

Counsel for:
Robert J. Butler

Counsel for:
Personal Communications I

William R. Miller
Russ Miller Rental
3620 Byers Avenue
Fortworth, Texas 76107

Joel Freedman
Vice President, General Counsel
Dial Call Communications
1355 Peachtree Street, Suite 755
Atlanta, GA 30309

Mark Lindquist
Communications Center, Inc.
Box 1034
Pierre, SD 57501

John D. Pellegrin
1140 Connecticut Avenue, N.W.
Suite 606
Washington, DC 20036

Counsel for:
American SMR Company

Duncan C. Kennedy
Genesee Business Radio
992 Cater Street
Rochester, NY 14621-1910

Meyer, Faller, Weisman
& Rosenberg, P.C.
Allan S. Tilles
4400 Jenifer Street, NW
Suite 380
Washington, DC 20015

Counsel for:
Parkinson Electronics

Ross & Hardies
888 16th Street, NW
Suite 400
Washington, DC 20006

Counsel for:
SMR Won

Fisher, Wayland, Cooper,
Leader & Zargoza, L.L.P.
2001 Pennsylvania Avenue, N.W.
Suite 400
Washington, DC 20006

Keller & Heckman
1001 G Street, NW
Suite 500 West
Washington, DC 20001

Counsel for:
The Southern Company
DCL Associates
American Petroleum Institute
US Sugar Corporation

Lewis H. Goldman
1850 M Street
Suite 1080
Washington, DC 20036

Counsel for:
Douglas L. Bradley

McCaw Cellular Communications, Inc.
1150 Connecticut Avenue, NW
Washington, DC 20036

Bryan Cave
700 Thirteenth Street, NW
Suite 700
Washington, DC 20005-3960

Counsel for:
CenCall, Inc.

Timothy P. Haley
Centennial Telecommunication
130 N. Bond Street
Suite 201
Bel Air, MD 21014

Latham & Watkins
1001 Pennsylvania Ave., NW
Washington, DC 20004

Counsel for:
Vanguard Cellular Systems
Raymond B. Grochowski

Charles C. Townsend
Atlantic Cellular Company
15 Westminster St., Suite 830
Providence, RI 02903

Raymond J. Stone
American Industrial & Marine Electronics, Inc.
P.O. Box 715
Dover, Delaware 19901

John E. Sonneland
Courtesy Communications
W. 801 Fifth Ave.
Suite 410
Spokane, WA 99204

Michael R. Carper
4643 South Ulster Street
Suite 500
Denver, CO 80237

Morrison & Foerster
2000 Pennsylvania Ave., N.W.
Suite 5500
Washington, DC 20006

Industrial Telecommunications Association, Inc.
Alliance of Private 800/900 MHZ Licenses
Frederick J. Day, Esq.
1110 North Glebe Road
Suite 500
Arlington, VA 22201-5720

Cellular Telecommunications
Industry Association
Michael F. Altschul
Vice President, General Counsel
1250 Connecticut Avenue, N.W.
Suite 200
Washington, DC 20036

Association of Public-Safety
Communications Officials International, Inc.
Wilkes, Artis, Hedrick & Lawe, Chartered
1666 K Street, N.W.
Suite 1100
Washington, DC 20006

Council of Independent Communication Suppliers
Frederick J. Day
Mark E. Crosby
1110 N. Glebe Road
Suite 500
Arlington, VA 22201-5720

Organization for the Protection and
Advancement of Small Telephone Companies
Lisa M. Zgina, General Counsel
21 Dupont Circle, N.W.
Suite 700
Washington, DC 20036

Dru Jenkinson, Inc.
Bessozzi, Gavin & Cravn
1901 L Street, N.W.
Suite 200
Washington, DC 20036

National Telephone Cooperative Assoc.
David Cosson
2626 Pennsylvania Ave., N.W.
Washington, DC 20037

Spectrum Resources, Inc.
A.C. Miller
307 Annandale Road
Suite 101
Falls Church, VA 22042

Chadmoore Communications
Keck, Mahin & Cate
1201 New York Avenue, N.W.
Washington, DC 20005-3919

Palmer Communications, Inc.
Marianne H. Lepara
12800 University Drive
Suite 500
Ft. Meyers, FL 33907-5333

Total Comm, Inc.
William C. Wyatt, President
2701 N. Van Buren
Enid, OK 73703

Utilities Telecommunications Council
Jeffrey L. Sheldon, General Counsel
1140 Connecticut Ave., N.W.
Suite 1140
Washington, DC 20036

U.S. Small Business Administration
Jere W. Glover, Esq.
409 3rd Street, S.W.
Washington, DC 20416

Communications Unlimited, Inc.
Lewis H. Goldman
1850 M. Street, N.W.
Suite 1080
Washington, DC 20036

Nextel Communications, Inc.
Robert S. Foosner
800 Connecticut Avenue, N.W.
Suite 1001
Washington, DC 20006

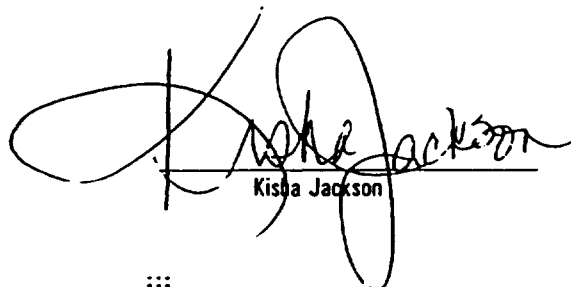
Telcelullar de Puerto Rico, Inc.
Law Offices of Richard S. Myers
1030 15th Street, N.W.
Suite 906
Washington, DC 20006

Freedom Mobile Communication, Inc.
Jerome M. Freund, President
14 Ray Street
Beaver Falls, PA 15010

Delta Communications, Inc.
Kimo C. Chun, Director
2646 Kiliha Street
Honolulu, HI 96819

Southwestern Bell
Linda M. Hood
173330 Preston Road
Suite 100A
Dallas, TX 75252

Associated Public Safety Communications Officer, Inc.
Wilkes, Artis, Hedrick & Lane, Chartered
1666 K Street, N.W.
Washington, DC 20006



Kisha Jackson